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As the applicants have pointed out in the previous response dated June 15, 2001, Morton does not describe nor suggest an indirect x-ray image detector suitable for radiology that uses a photoreceptor made of a co-planar thin layer of amorphous selenium-based multilayer structure. There is no reference in Morton to such structure and certainly no indication whatsoever that it could be used in an indirect x-ray image detector. The Examiner has admitted this point by stating that Morton lacks the co-planar thin photoreceptor made of selenium multilayer structure.

With regard to Schiebel et al., it is respectfully submitted that, as stated in the same previous response, this reference is irrelevant to the indirect x-ray image detector of the present invention since it concerns only direct conversion of x-rays into a thick photoconductor layer. In Schiebel et al., there is no scintillator to convert x-rays into light, but rather there is a direct conversion detector in which conventional readout panels are associated to x-ray thick photoconductors, among which amorphous selenium is included (cf. column 5, lines 38-42).

Contrary to Schiebel, the present applicants clearly claim "an indirect x-ray image detector" as it is defined right at the beginning of the disclosure, on page 1, lines 5-7. Such indirect detector has an x-ray conversion scintillator that absorbs about 80%-90% of incoming radiation while converting x-rays into light (cf. page 8, line 11-12 of the present disclosure). Moreover, applicants' photoreceptor is made of "a co-planar thin layer of amorphous selenium based multilayer structure" which is totally different from the thick photoconductor 32 of Schiebel et al. which "must have a thickness of between 200 and 800µm so as to achieve adequate absorption of the x-ray quanta" (cf. column 5, lines 40-42).

According to MPEP 2143, a basic requirement of a *prima facie* case of obviousness is

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that "...the prior art reference (or references when combined) must teach or suggest all the claim limitations". Furthermore, according to MPEP 2143.01, the prior art must suggest the desirability of the claimed invention.

It is respectfully submitted that by combining Morton with Schiebel et al., the Examiner has not met either of the above conditions. Thus, there is no photoreceptor made of a co-planar thin layer of amorphous selenium based multilayer structure in either Morton or Schiebel et al. and there is absolutely no suggestion of a desirability by Schiebel et al. to have such photoreceptor in an indirect x-ray image detector. In fact, Schiebel et al. requires a thick photoconductor "to achieve adequate absorption of the x-ray quanta" and makes no hint whatsoever that the absorption of x-rays could be performed by means of a scintillator in an indirect fashion.

With hindsight of applicants' disclosure, the Examiner combined and modified Morton and Schiebel et al. references so as to arrive at the present invention, without taking into account the explanatory notes of MPEP 2143.01, where it is clearly stated that "the fact that references can be combined or modified is not sufficient to establish *prima facie* obviousness, unless the prior art also suggests the desirability of the combination (In re Mills, 916 F.2d 680, 16 USPQ 2d 1432, Fed. Cir. 1990)."

Based on the above, applicants respectfully submit that the rejection of claim 1 presently on file is improper and that claim 1 is not obvious in view of the combination of Morton and Schiebel et al. and that it is in fact drawn to allowable subject matter. All other claims in this application relate directly or indirectly to claim 1 and should, therefore, also be found allowable for that reason. An early, favorable action is, therefore, solicited.

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Should the Examiner believe that anything else is required to place this application in condition for allowance, he is requested to contact applicants' agent by telephone.

Respectfully submitted,



Date: Dec. 23, 2002
GJP/pp

by: George J. Primak
Agent for the Applicants
Reg. No. 24,991
Customer No. 026031

13480 Huntington
Montreal, Quebec
Canada H8Z 1G2

Tel: (514) 620-3936
Fax: (514) 620-7925
Atty Dkt.: 462-USA